

**BAKER & HOSTETLER LLP**

45 Rockefeller Plaza  
New York, NY 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Marc E. Hirschfield  
Nicholas J. Cremona  
Dean D. Hunt

*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC and  
the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

PANAGIOTIS SAKELLARIOU SETTLEMENT, an  
irrevocable trust u/a/d 12/17/92, SG HAMBROS  
BANK & TRUST (BAHAMAS) LIMITED, in its  
capacity as trustee of the Panagiotis Sakellariou  
Settlement an irrevocable trust u/a/d 12/17/92,

Adv. Pro. No. 10-04392 (SMB)

CONSTANTINE PALEOLOGOS, individually,  
CELIA PALEOLOGOS, individually, and CHRIS G.  
LAZARIDES, individually,

Defendants.

**NOTICE OF MEDIATION REFERRAL**

On November 10, 2010, this Court entered the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the “Order”)<sup>1</sup> [Adv. Pro. No. 08-01789 (SMB), Dkt. No. 3141]. Pursuant to the Notice of Applicability filed by Plaintiff Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.* (“SIPA”), and the substantively consolidated estate of Bernard L. Madoff individually (“Madoff”) [Dkt. No. 2], the Order and the avoidance procedures contained therein (the “Avoidance Procedures”) are applicable to the instant matter.

Pursuant to the Avoidance Procedures, the Trustee and Defendants may jointly agree to enter mediation prior to or upon completion of discovery without further court order. Avoidance Procedures, ¶ 5A.

Through this Notice of Mediation Referral, the Trustee and Defendants (the “Parties”) hereby mutually agree to enter mediation. Pursuant to the Avoidance Procedures, the Response Due Date shall be deferred for Defendants Constantine Paleologos and Celia Paleologos while the mediation is pending. Avoidance Procedures, ¶ 2E.

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<sup>1</sup> All terms not defined herein shall be given the meaning ascribed to them in the Order.

Pursuant to the Avoidance Procedures, the Parties agree that within 14 calendar days after the filing of this Notice of Mediation Referral, the Parties shall choose a mediator in accordance with the Mediation Order. If the Parties are unable to agree on a mediator, the Court shall appoint one in accordance with the Mediation Order.

Dated: May 09, 2014

/s/ Nicholas J. Cremona

Baker & Hostetler LLP  
45 Rockefeller Plaza  
New York, NY 10111  
Telephone: 212.589.4200  
Facsimile: 212.589.4201  
David J. Sheehan  
E-mail: [dsheehand@bakerlaw.com](mailto:dsheehand@bakerlaw.com)  
Marc E. Hirschfield  
E-mail: [mhirschfield@bakerlaw.com](mailto:mhirschfield@bakerlaw.com)  
Nicholas J. Cremona  
E-mail: [jcremona@bakerlaw.com](mailto:jcremona@bakerlaw.com)

*Attorneys for Irving H. Picard,  
Trustee for the Substantively Consolidated  
SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and the Estate of  
Bernard L. Madoff*

/s/ Michael Goldberg

Akerman, LLP  
Susan F. Balaschak  
E-mail: [susan.balaschak@akerman.com](mailto:susan.balaschak@akerman.com)  
335 Madison Avenue, Suite 2600  
New York, NY 10017  
Telephone: 212.880. 3800  
Facsimile: 212.880.8965

Michael I. Goldberg (MG 0869)  
Email: [michael.goldberg@akerman.com](mailto:michael.goldberg@akerman.com)  
Las Olas Center II, Suite 1600  
350 East Las Olas Boulevard Fort  
Lauderdale, FL 33301-2229  
Telephone: 954.463.2700  
Facsimile: 954.463.2224

*Attorneys for Defendants Constantine  
Paleologos and Celia Paleologos*

/s/ John F. Zulack  
Flemming Zulack Williamson Zauderer LLP  
John F. Zulack  
E-mail: [jzulack@fzwz.com](mailto:jzulack@fzwz.com)  
One Liberty Plaza  
New York, New York 10006  
Telephone: (212) 412-9500

*Attorneys for Defendants Panagiotis  
Sakellariou Settlement, an irrevocable trust  
u/a/d/ 12/17/92, and SG Hambros Bank &  
Trust (Bahamas) Limited, in its capacity as  
trustee of the Panagiotis Sakellariou  
Settlement, an irrevocable trust u/a/d  
12/17/92*